



**Todd & Weld**LLP

Christian G. Kiely  
ckiely@toddweld.com

March 8, 2022

**VIA ECF**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP  
Disclosure of settlement agreement in *Giuffre v. Maxwell***

Your Honor:

I write to report that the parties and non-party Ghislaine Maxwell have reached an agreement regarding the production to Defendant of the settlement agreement entered into between Plaintiff and Ghislaine Maxwell, which obviates the need for Ms. Maxwell to file objections. The parties and Ms. Maxwell have agreed that the identity of a liability insurer who funded the settlement will be redacted from the agreement at the insurer's request. In addition, the parties and Ms. Maxwell have agreed to negotiate an addendum to the Stipulated Protective Order (ECF No. 227) which will allow the settlement agreement to be designated confidential under that Protective Order. This resolves all pending issues relating to the disclosure to Defendant of the settlement agreement between Plaintiff and Ms. Maxwell.

Respectfully submitted,

/s/ Christian G. Kiely  
Christian G. Kiely

cc: All counsel of record, via ECF